



U.S. Department of Justice

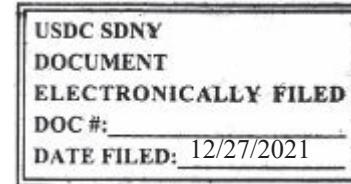
United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 23, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007



Re: United States v. Delvis Ramirez et al., 21 Cr. 41 (AJN)

Dear Judge Nathan:

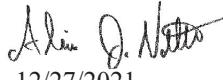
The Government respectfully submits this joint letter on behalf of the parties to request a modification of pretrial deadlines.

On August 7, 2021, the Court issued a scheduling order setting forth the pretrial deadlines and alerting the parties that the Court would request a March 7, 2022 trial date. On December 10, 2021, the Court issued a scheduling order advising the parties that the Clerk's Office had scheduled this trial as the third backup on March 22, 2022.

Based on discussions with defense counsel, the Government does not currently expect any defendant to proceed to trial. However, the parties need additional time to continue and finalize potential dispositions. Accordingly, and in light of the fact that the trial is currently the third

backup on March 22, the parties respectfully request the following modifications to the pretrial deadlines, which will permit the parties to focus on finalizing dispositions:

SO ORDERED.



12/27/2021

| Filing | Current Due Date | Requested Due Date |
|---------------------|------------------|--------------------|
| Motions in limine | January 3, 2021 | February 4, 2022 |
| Rule 404(b) Motions | | |
| Oppositions | January 17, 2021 | February 18, 2022 |
| Replies | January 24, 2021 | February 25, 2022 |
| Voir Dire | January 28, 2022 | February 25, 2022 |
| Requests to Charge | | |

The parties respectfully submit that the requested modifications will obviate the need for unnecessary filings, but will permit the trial to proceed on March 22 if necessary.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
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CC (By ECF)

All Counsel of Record